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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92055358
Party	Defendant Urban Asphalt Skatewear
Correspondence Address	URBAN ASPHALT SKATEWEAR 1837 VILLA MAISON # A MOUNT LEASANT, SC 29464 UNITED STATES
Submission	Answer
Filer's Name	Nadia Y. Munoz
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Signature	/Nadia Y. Munoz/
Date	04/30/2012
Attachments	Answer Cancellation No. 92055358-Ref. No. TM07.pdf (4 pages)(124986 bytes) Certificate of Service-Cancellation No. 92055358-Ref. No. TM07.pdf (1 page)(5183 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Under Armour, Inc.,

Petitioner,

v.

Urban Asphalt Skatewear,

Registrant.

Cancellation No. 92055358

Registration No. 3611357

Publication Date: February 10, 2009

Registration Date: April 28, 2009

Mark: UA URBAN ASPHALT

**REGISTRANT'S ANSWER TO PETITION FOR CANCELLATION AND
AFFIRMATIVE DEFENSES**

Registrant, UA Urban Asphalt Skatewear, a Florida Limited Liability Company, by its attorneys hereby responds to the allegations set forth in the Petition for Cancellation filed by Petitioner, Under Armour, Inc., a Maryland Corporation as follows:

1. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 1 of the Petition for Cancellation, and therefore, denies said allegations.
2. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 2 of the Petition for Cancellation, and therefore, denies said allegations.
3. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 3 of the Petition for Cancellation, and therefore, denies said allegations.
4. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 4 of the Petition for Cancellation, and therefore, denies said allegations.

5. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 5 of the Petition for Cancellation, and therefore, denies said allegations.
6. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 6 of the Petition for Cancellation, and therefore, denies said allegations.
7. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 7 of the Petition for Cancellation, and therefore, denies said allegations.
8. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 8 of the Petition for Cancellation, and therefore, denies said allegations.
9. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 9 of the Petition for Cancellation, and therefore, denies said allegations.
10. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 10 of the Petition for Cancellation, and therefore, denies said allegations.
11. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 11 of the Petition for Cancellation, and therefore, denies said allegations.
12. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 12 of the Petition for Cancellation, and therefore, denies said allegations.
13. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 13 of the Petition for Cancellation, and therefore, denies said allegations.
14. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 14 of the Petition for Cancellation, and therefore, denies said allegations.
15. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 15 of the Petition for Cancellation, and therefore, denies said allegations.

16. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 16 of the Petition for Cancellation, and therefore, denies said allegations.
17. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 17 of the Petition for Cancellation, and therefore, denies said allegations.
18. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 18 of the Petition for Cancellation, and therefore, denies said allegations.
19. Registrant admits that the United States Patent and Trademark Office's TESS database indicates that Registrant is the owner of the trademark registration referenced in allegation 19 of the Petition for Cancellation. Registrant has insufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 19 of the Petition for Cancellation, and therefore, denies said allegations.
20. Registrant admits the allegations set forth in Paragraph 20 of the Petition for Cancellation.
21. Registrant admits the allegations set forth in Paragraph 21 of the Petition for Cancellation.
22. Registrant admits the allegations set forth in Paragraph 22 of the Petition for Cancellation.
23. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 23 of the Petition for Cancellation, and therefore, denies said allegations.
24. Registrant denies the allegations set forth in Paragraph 24 of the Petition for Cancellation.
25. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 25 of the Petition for Cancellation, and therefore, denies said allegations.
26. Registrant denies the allegations contained in Paragraph 26 of the Petition of Cancellation.
27. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 27 of the Petition for Cancellation, and therefore, denies said allegations.
28. Registrant denies the allegations contained in Paragraph 28 of the Petition of Cancellation.

29. Registrant denies the allegations contained in Paragraph 29 of the Petition of Cancellation.
30. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 30 of the Petition for Cancellation, and therefore, denies said allegations.
31. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 31 of the Petition for Cancellation, and therefore, denies said allegations.
32. Registrant denies the allegations contained in Paragraph 32 of the Petition of Cancellation.

AFFIRMATIVE DEFENSES

33. Petitioner has failed to state a claim upon which relief can be granted.
34. Petitioner's claims are barred by the doctrine of laches.
35. Petitioner's claims are barred by the doctrine of acquiescence.
36. Petitioner's claims are barred by the doctrine of equitable estoppel.

PRAYER FOR RELIEF

WHEREFORE, Registrant prays that this Petition for Cancellation be denied and that Registration No. 3611357 of Mark UA URBAN ASPHALT be sustained.

Dated: April 30, 2012

Respectfully Submitted,

By: /Nadia Y Munoz/
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Attorneys for Registrant, UA Urban Asphalt

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the following ANSWER AND AFFIRMATIVE DEFENSE was served on April 30, 2012 by electronic mail and first-class mail, postage prepaid, to Petitioner, Under Armour Inc., at:

Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P.
Attn: Danny M. Awdeh, Attorney for Petitioner, Under Armour Inc.
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/Nadia Y. Munoz/
Nadia Y. Munoz
Attorney for Registrant